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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 KIRK MAYEDA,

12 Plaintiff,

13 vs.

14 SMITH'S FOOD & DRUG CENTERS, INC.  
a/k/a KROGER, a Foreign Corporation;  
SECURITAS SECURITY SERVICES USA,  
INC., a Foreign Corporation; DOE EMPLOYEE;  
DOES I-X; ROE ENTITIES I-X, inclusive,

17 Defendants.

18 CASE NO. 2:24-cv-01733-CDS-MDC

19 **STIPULATION AND ORDER FOR**  
**LEAVE TO AMEND COMPLAINT**

20 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, KIRK  
MAYEDA and Defendant SMITH'S FOOD & DRUG CENTERS, INC. a/k/a/ Kroger, by and  
through their respective counsel of record, that Plaintiff shall be permitted to amend his Complaint  
in the manner set forth in the proposed First Amended Complaint, attached hereto as Exhibit "1"  
and incorporated by this reference herein. It is further agreed that the Defendant SMITH'S FOOD  
& DRUG CENTERS, INC. a/k/a KROGER shall have fourteen (14) days from the date the First  
Amended Complaint is served to respond to the First Amended Complaint.

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1           **IT IS SO STIPULATED.**

2           Dated: December 12th, 2024.

3           KAPLAN LAW GROUP

5           By: /s/ Brittany A. Kaplan  
6           BRITTANY A. KAPLAN, ESQ.  
7           Nevada Bar No. 13663  
8           10091 Park Run Drive, Suite 190  
9           Las Vegas, Nevada 89145  
10          *Attorneys for Plaintiff*

Dated: December 12th, 2024.

COOPER LEVENS, P.A.

5           By: /s/ Scott L. Stonehocker  
6           SCOTT L. STONEHOCKER, ESQ.  
7           Nevada Bar No.: 005512  
8           3016 West Charleston Boulevard -#195  
9           Las Vegas, Nevada 89102  
10          *Attorneys for Defendant Smith's Food & Drug*  
11          *Centers, Inc. a/k/a Kroger*

11           **ORDER**

12          **IT IS HEREBY ORDERED** that Plaintiff is and shall be permitted to amend his  
13          Complaint in the manner set forth in the Proposed First Amended Complaint, attached hereto as  
14          **Exhibit “1”**.

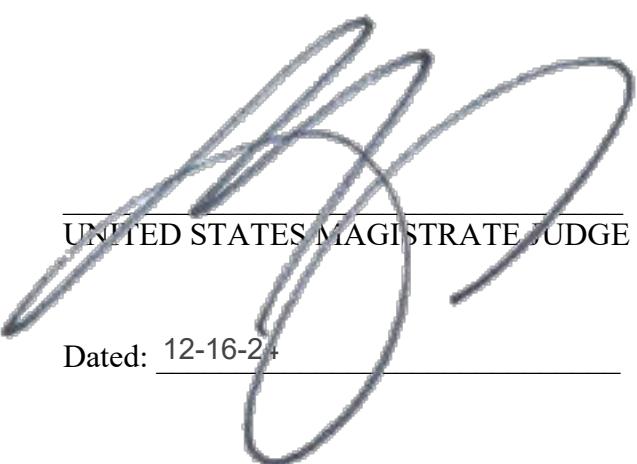
15          IT IS HEREBY FURTHER ORDERED that Defendant SMITH'S FOOD & DRUG  
16          CENTERS, INC. a/k/a KROGER shall have fourteen (14) days from the date the First Amended  
17          Complaint is served to respond to the First Amended Complaint.

18          IT IS SO ORDERED the stipulation is granted. The First Amended Complaint shall be  
19          filed and served upon defendant Smith Food & Drug Centers, Inc. by  
20          **December 20, 2024**. First Amended Complaint shall be served upon defendant  
21          Securitas Security Services USA, Inc. by **March 20, 2025**.

22  
23          Prepared and Submitted by:

24          KAPLAN LAW GROUP

25          By: /s/ Brittany A. Kaplan  
26          BRITTANY A. KAPLAN, ESQ.  
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30          *Attorneys for Plaintiff*

31             
32           UNITED STATES MAGISTRATE JUDGE

33          Dated: 12-16-24